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PRE-APPEAL BRIEF REQUEST FOR REVIEW

Docket Number (Optional)

P-2177

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on EFS-web -- 5 March 2007

Signature /James D. Ivey/

Typed or printed name James D. Ivey

Application Number

09/888,222

Filed

22 June 2001

First Named Inventor

Samuel Yin Lun Pun

Art Unit

2654

Examiner

Angela A. Armstrong

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).

Note: No more than five (5) pages may be provided.

I am the

☐ applicant/inventor.

☐ assignee of record of the entire interest.
See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed.
(Form PTO/SB/96)

☒ attorney or agent of record.
Registration number 37,016

☐ attorney or agent acting under 37 CFR 1.34.
Registration number if acting under 37 CFR 1.34 _____

/James D. Ivey/

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Telephone number

5 March 2007

Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required.
Submit multiple forms if more than one signature is required, see below*.

☐ *Total of _____ forms are submitted.

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

<i>REASONS IN SUPPORT OF REQUEST FOR PRE-APPEAL CONFERENCE</i>	Serial Number	09/888,222
	Filing Date	June 22, 2001
	Title	Japanese Language Entry Mechanism for Small Keypads
	First Named Inventor	Samuel Yin Lun Pun
	Examiner	Angela A. Armstrong
	Art Unit	2654
	Attorney Docket	P-2177

Mail Stop AF
Hon. Assistant Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

March 5, 2007

Dear Sirs:

REASONS IN SUPPORT OF REQUEST FOR PRE-APPEAL CONFERENCE

The Examiner rejected Claims 1-40 under Section 103(a) as being unpatentable over Nakayama et al. (U.S. Patent 4,531,119) in view of Krueger et al. (U.S. Patent 5,999,950) and Grover (U.S. Patent 5,818,437) and – with respect to Claims 25, 26, and 28 – Ho et al. (US Patent 6,307,541). Applicant respectfully traverses this rejection and requests reconsideration and withdrawal of this rejection.

Claim 1 recites “receiving one or more signals generated by the user which specify one or more phonetic symbol categories each of which includes one or more syllables and at least one of which includes two or more syllables.” The Examiner cited Table 5 in column 5 of Krueger et al. as teaching that user-generated signals can represent at least one phonetic symbol category that includes two or more syllables. However, nowhere in Table 5 or in the accompanying text does Krueger et al. teach or suggest that the user can specify a phonetic symbol category of two or more syllables. Instead, Krueger et al. teach that a user can specify a single syllable unambiguously by pressing a given key a given number of times. In particular, the user of the system of Krueger et al. can specify hiragana “ha” *or* hiragana “ba” *or* hiragana “pa” but cannot

specify a phonetic symbol category that includes “ha”, “ba”, *and* “pa.” Claim 1 is therefore allowable. Claims 2-40 directly or indirectly recite similar language and are therefore similarly allowable.

Claim 2 recites that “the one or more phonetic symbol categories are each associated with a respective distinct consonant by including all syllables that include the respective distinct consonant.” The only teaching cited by the Examiner in support of rejecting Claim 2 is Nakayama et al. at column 3, lines 4-10. That paragraph of Nakayama et al. only describes which keys can be pressed to select from a number of candidate kanji derived from user-specified kana. Nothing in the cited passage teaches or suggests that a phonetic symbol category includes all syllables that include a particular consonant. As an illustration, Figure 3 of Nakayama et al. shows that each of the 5 kana that includes a “k” consonant sound is represented by a respective, different key: T = “ka”; G = “ki”; B = “ko”; H = “ku”; and * = “ke”. Nakayama et al. neither teach nor suggest any way that a user can specify a group that includes all of those syllables that include the “k” consonant sound. Claim 2 is therefore allowable for this additional reason. Claims 3-4, 10-12, 18-20 directly or indirectly recite similar language and are therefore similarly allowable.

Claim 29 recites that “each of the one or more phonetic symbol categories corresponds to a distinct respective row of a fifty sounds table.” As discussed above with respect to Claim 2, Nakayama et al. neither teach nor suggest any way that a user can specify a group that includes more than one syllable – i.e., that is ambiguous. Instead, Nakayama et al. teach only unambiguous user specification of syllables. Claim 29 is therefore allowable for reasons similar to those given above with respect to Claim 2. Claims 33 and 37 recite similar subject matter and are therefore similarly allowable.

Applicant therefore respectfully submits that all pending claims are allowable over any combination of Nakayama et al. with Krueger et al., Grover et al., and Ho et al., assuming *arguendo* that such combination is properly motivated in the prior art. Claims 1-40 are therefore allowable.

Respectfully submitted,
/James D. Ivey/

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